

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

TECHNOLOGY INNOVATIONS  
ASSOCIATES LLC,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

C.A. No. 13-355-LPS

**JURY TRIAL DEMANDED**

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Plaintiff Technology Innovations Associates LLC (“TIA”) and Defendant Google, Inc. (“Google”) jointly and respectfully move the Court to amend the current Case Scheduling Order (Doc. 58) as follows:

<b><u>Event</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed Deadline</u></b>
Plaintiff’s Production of an Initial Claim chart relating each known accused product to the asserted claims (Doc. 58 at ¶7(c))	January 9, 2015	February 6, 2015
Invalidity Contentions and prior art production (Doc. 58 at ¶7(d))	February 16, 2015	March 16, 2015
Substantial Completion of Document Production (Doc. 58 at ¶8(b))	April 6, 2015	May 4, 2015
Motion to amend the pleadings to allege inequitable conduct (Doc. 58 at ¶2)	April 6, 2015	May 4, 2015
Exchange Claim Terms for Construction (Doc. 58 at ¶12)	March 5, 2015	April 2, 2015
Submit Joint Claim Construction Chart (Doc. 58 at ¶12)	March 25, 2015	April 23, 2015

<u><b>Event</b></u>	<u><b>Current Deadline</b></u>	<u><b>Proposed Deadline</b></u>
Opening Claim Construction Brief (Doc. 58 at ¶13) and Tutorials (if any) (Doc. 58 at ¶11)	April 5, 2015	May 4, 2015
Responsive Claim Construction Briefs (Doc. 58 at ¶13)	May 6, 2015	June 3, 2015

The requested modifications are sought to promote potential resolution of this matter. The requested modifications to the schedule will not affect any other deadlines, including the *Markman* hearing date of August 3, 2015, or prejudice any party in any foreseeable manner.

Dated: January 6, 2015

BAYARD, P.A.

/s/ Stephen B. Brauerman

Richard D. Kirk (#922)  
Stephen B. Brauerman (#4952)  
Bayard, P.A.  
222 Delaware Avenue, Suite 900  
P.O. Box 25130  
Wilmington, DE 19899  
(302) 655-5000  
rkirk@bayardlaw.com  
sbrauerman@bayardlaw.com

ATTORNEYS FOR PLAINTIFF  
TECHNOLOGY INNOVATIONS  
ASSOCIATES, LLC

POTTER ANDERSON & CORROON LLP

/s/ Richard L. Horwitz

Richard L. Horwitz (#2246)  
David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Hercules Plaza, 6th Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
rhorwitz@potteranderson.com  
dmoore@potteranderson.com  
bpalapura@potteranderson.com

ATTORNEYS FOR DEFENDANT  
GOOGLE, INC.

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
Hon. Leonard P. Stark  
Chief United States District Judge